



FLORIDA DEPARTMENT OF
**CHILDREN
& FAMILIES**

Lawton Chiles
Governor

Edward A. Feaver
Secretary

December 16, 1997

Cynthia L. Johnson, Director
Cash Management Policy &
Planning Division
Financial Management Service
U. S. Department of the Treasury
Room 420, 401 14th Street, SW
Washington, DC 20227

Dear Ms. Johnson:

This is to provide you with the State of Florida's comments (attached) on the proposed rule, "Management of Federal Agency Disbursements." 31 CFR Part 208, as contained in the Federal Register, Vol. 62, No. 179, Tuesday, September 16, 1997. If you have any questions, please contact Connie Reinhardt, EBT Project Director, at (850) 922-0232.

Sincerely,

Samara H. Navarro

Samara H. Navarro, D. B. A.
Deputy Secretary

Attachment

1317 Winewood Boulevard • Tallahassee, Florida 32399-0700

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and live in stable families and communities.

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STATE OF FLORIDA
COMMENTS TO THE PROPOSED RULE, "MANAGEMENT OF FEDERAL
AGENCY DISBURSEMENTS," 31 CFR PART 208, AS CONTAINED IN THE
FEDERAL REGISTER, VOL. 62, NO. 179, TUESDAY, SEPTEMBER 16 1997

The State of Florida, as a member of the Southern Alliance of States (SAS), submits the following comments on the U. S. Treasury's proposed rule regarding management of federal agency disbursement through electronic funds transfer (EFT) and electronic benefits transfer (EBT). The proposed regulations implement the "second phase" of section 3100(x) of the Debt Collection Improvement Act of 1996, which requires federal agencies to convert all federal payments to electronic transfer by 1997. Florida, as a member of the SAS, is currently implementing an EBT system that delivers both state and federally administered benefits on a single access card using the existing commercial infrastructure.

Florida requests that the U. S. Treasury include a provision for continuing existing state/federal EBT/EFT partnerships such as the SAS in the Rule and confirm that the accounts established in such a project satisfy the EBT and EFT requirements consistent with section 3336(b) of Title 31, United States Code. We also recommend that Treasury continue the practice of allowing states the option of selecting its current EBT Issuer as the Issuer for both state and federal benefits. This concept supports enhanced and streamlined services for recipients, retailers, and ATM networks through consolidation of card issuance, customer service, benefit access, and settlement processes.